

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
JAISON KELLY,	:	Bankruptcy No. 24-22201-GLT
	:	
<i>Debtor,</i>	:	Related to Doc. No.
=====	:	
JAISON KELLY,	:	Hearing Date and Time:
	:	
<i>Movant,</i>	:	
	:	
vs.	:	
SLOVAK SAVINGS BANK,	:	
<i>Respondent</i>	:	

DEBTOR'S MOTION FOR ENLARGEMENT OF TIME TO
FILE MOTION FOR LOSS MITIGATION

AND NOW comes the Debtor, JAISON KELLY, by and through the Debtor's Attorney, MICHAEL S. GEISLER, ESQUIRE, and files this Motion, of which the following is a statement:

1. Movant is the Debtor.
2. The Debtor filed a Chapter 13 Petition on 9/4/2024.
3. The Court has imposed a deadline of 12/27/2024 to file a Motion for Loss Mitigation.
4. The Debtor needs more time to gather the documents necessary to file a Motion for Loss Mitigation.
5. The Debtor is not attempting to improperly delay this case.

WHEREFORE, the Debtor prays that this Court enter an order extending the deadline to file a Motion for Loss Mitigation an additional ten (10) days.

/s/ Michael S. Geisler

DATED: 12/27/2024

MICHAEL S. GEISLER, ESQUIRE

Pa. I.D. No. 39414

Attorney for Debtor

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Pittsburgh, PA 15235

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CERTIFICATE OF SERVICE

I, MICHAEL S. GEISLER, ESQUIRE, Attorney for the Debtor, hereby certify that I have served a true and correct copy of the within Motion upon the following by First Class Mail, Postage prepaid, unless otherwise indicated below:

RONDA J. WINNECOUR, TRUSTEE
3250 US Steel Tower
600 Grant Street
Pittsburgh, PA 15219

(BY ELECTRONIC MEANS)

OFFICE OF THE U.S. TRUSTEE
970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

(BY ELECTRONIC MEANS)

J. MICHAEL MCCAGUE, ESQUIRE
Griffith McCague & Wallace PC
408 Cedar Avenue
Pittsburgh, PA 15212

(BY ELECTRONIC MEANS)

DATED: 12/27/2024

/s/ Michael S. Geisler

MICHAEL S. GEISLER, ESQUIRE

Pa. I.D. No. 39414

Attorney for Debtor

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